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**Subject:** NPDES federal 4th Quarter 2019 QNCR and SNC Summary  
**Attachments:** QNCR\_Coordinators\_Q4\_2019\_Minors.xlsx; R9 - CA QNCR Summary - List Only SNC 02-03-20.pdf; QNCR\_Coordinators\_Q4\_2019\_Majors.xlsx

Hello.

**Executive Summary** - I've attached the QNCR Summary for 4Q2019. The facilities in red are in SNC. I've also attached QNCR spreadsheets which shows which violations DWQ investigated and the outcome. Please conduct a high level review and flag anything you think is erroneous so we can investigate further.

I'm casting a wider net with this email to ensure everyone involved in the NPDES program knows which facilities are on the quarterly QNCR and in significant noncompliance (SNC). Please feel free to pass this on to anyone I omitted.

**Background** - Here is the current 4-week-long QNCR process:

- EPA sends the QNCR files for all the regions to DWQ NPDES staff.
- DWQ NPDES staff and student go through it to check if the reporting, effluent, and compliance schedule violations are valid (mostly comparing them to what is in the SMRs).
- DWQ staff encourage dischargers who don't submit DMRs to do so.
- Many violations will be resolved (by DWQ or the dischargers) in the federal database before RB staff even have to see them.
- DWQ may contact staff at the applicable RB or the discharger for clarification.

- DWQ goes through the process a second time, because some dischargers submit on the 1<sup>st</sup> of the month and some on the 15<sup>th</sup>.
- Once the review is complete, DWQ uploads the final QNCR response to PG Environmental's SharePoint.
- OE distributes the QNCR Summary to its SNC group (the group was more or less put together by the RB AEOs).
- OE meets with Regional Boards to discuss enforcement and takes any higher level policy issues to the NPDES and/or enforcement roundtables.

However, for the last quarter I did not distribute final QNCR because I was out of the office. I have also not been able to do a complete validation of the data so there may still be errors. I have gone through the compliance schedule violations and resolved 6 violations. There are currently only three facilities in violation of their compliance schedules: Alturas WWTP; Mammoth, Sutro, Keystone et al.; and Hot Creek Hatchery.

**Next steps** - I have begun validating effluent violations ("E" and "X" violations). I have found a discharger calculation error and what appears to be a bug in the federal database impacting Inglewood Oil Field. I've added my own notes in the QNCR spreadsheets and in EPA's SNC spreadsheet will continue to do so.

Please review (or delegate) your facilities in the attached documents, determine if there are any false positives or negatives, and let me know which those are; it will speed up my validation process and hopefully reduce the number of violations next quarter. If you need further incentive, we do have support from EPA Region 9 in reducing our SNC rate and they have provided us with contractor and staff support.

Thank you for your time.

Sincerely,  
Erin

*Erin Mustain, P.E.*

Senior Water Resource Control Eng. (Spec.)

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